

Exhibit 65

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF VIRGINIA
3 ALEXANDRIA DIVISION

4 -----x
5 COALITION FOR TJ, :
6 Plaintiff, :
7 v. : Civil Action No.:
8 FAIRFAX COUNTY SCHOOL : 1:21-cv-00296-CMH-JFA

9 BOARD, :
10 Defendant. :
11 -----x

12 Deposition of Coalition for TJ
13 By and through its Designee

14 GLENN MILLER
15 McLean, Virginia

16 Monday, October 18, 2021

17 2:18 p.m.

18
19
20 Job No.: 404859

21 Pages: 1 - 137

22 Reported by: Judith E. Bellinger, RPR, CRR

1 A Yes.

2 Q And I think you also mentioned Cooper
3 Middle School.

4 A I meant Kilmer. It was Kilmer, not
5 Cooper. Kilmer and Longfellow were combined
6 together, not Cooper and Longfellow. It was
7 Kilmer and -- Cooper and Kilmer.

8 Q Okay. Thank you.

9 A Yeah.

10 Q Then I would like to ask you some
11 questions about the second-look semifinalist
12 proposal that we spent a lot of time on today.

13 A Yeah.

14 Q The second-look proposal, is it fair to
15 characterize that as a response to the proposed
16 merit lottery?

17 A That -- yeah. It's a response to the
18 merit lottery. It is not something -- it is not
19 our optimal solution, but it is in response to, at
20 the time, to a system that was, you know, bad and
21 we were trying to come up with a compromise based
22 on the current situation. But it's not -- it's

1 not, you know, it's not necessarily the most
2 optimal system.

3 Q So it was the only formal proposal that
4 was written up and given to the board, but was it
5 intended to be the coalition's position on how
6 TJ's admissions should be done?

7 MS. REWARI: Objection. Leading.

8 A It was a -- it was a compromised
9 proposal to deal with the current situation. It
10 was not our optimal position. Our optimal
11 position was some variation of what was originally
12 in place, with the standardized test.

13 Q And so does the coalition believe that
14 the second-look proposal was preferable to keeping
15 the preexisting admission system?

16 A No.

17 Q Is it the coalition's responsibility to
18 come up with an admissions system for TJ?

19 MS. REWARI: Objection. Calls for a
20 legal conclusion.

21 A No. It's -- that's up to the county
22 and it's up to the judge.

Conducted on October 18, 2021

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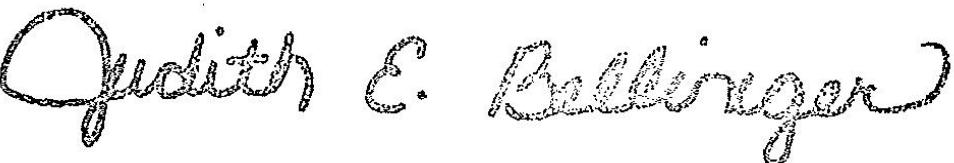
1 CERTIFICATE OF REPORTER - NOTARY PUBLIC

2 I, JUDITH E. BELLINGER, RPR, CRR, the
3 officer before whom the foregoing deposition was
4 taken, do hereby certify that the foregoing
5 transcript is a true and correct record of the
6 testimony given; that said testimony was taken by
7 me and thereafter reduced to typewriting under my
8 direction; that reading and signing was not
9 requested; and that I am neither counsel for,
10 related to, nor employed by any of the parties to
11 this case and have no interest, financial or
12 otherwise, in its outcome.

13 IN WITNESS WHEREOF, I have hereunto set
14 my hand and affixed my notarial seal this 5th day
15 of November, 2021.

16 My Commission Expires: September 30, 2024

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20 NOTARY PUBLIC IN AND FOR

21 THE COMMONWEALTH OF VIRGINIA

22